

FILED

MAY 02 2014

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

V.

STACY JO KANALLAKAN,

Defendant.

CRIMINAL NO. 14-CR-30065-MJR

STIPULATION OF FACTS

Comes now Stephen R. Wigginton, United States Attorney for the Southern District of Illinois, and Stuart Zander, Special Assistant United States Attorney for said District, and herewith enters into the following Stipulation of Facts with the Defendant,

1. Defendant, **STACY JO KANALLAKAN**, during the time frames alleged in the information, held the titles of bookkeeper and accountant for Telsar Laboratories, Inc. (TLI). With both titles, the Defendant was responsible for handling payroll for the company.

2. Defendant, during the time frame alleged, utilizing her knowledge, and access to the company payroll, engaged in a scheme to fraudulently increase payments made to her by the company.

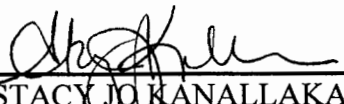
3. Payments made to employees would, in the normal course of business, be made utilizing both electronic direct transfers of funds and by paper checks. The Defendant defrauded TLI by both fraudulently causing and increasing direct deposits to her own accounts and by causing the creation of and increasing payments made to her by check.

4. The acts alleged in the Information, and specifically the interstate wire transactions, utilized Liberty Bank and their payroll processing, which is located in Brookfield, Wisconsin.

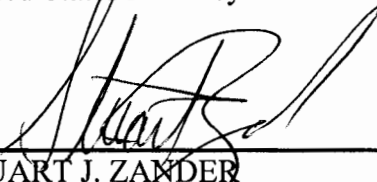
5. During the time frame alleged in the Information, the Defendant defrauded TLI of more than \$400,000 from TLI.

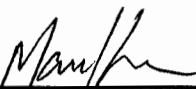
6. TLI is located in Madison County Illinois, and all acts in furtherance of the scheme originated within the Southern District of Illinois.

SO STIPULATED:


STACY JO KANALLAKAN
Defendant

STEPHEN R. WIGGINTON
United States Attorney


STUART J. ZANDER
Special Assistant United States Attorney

 (MARCELL J. JOHNSON)
ADAM D. FEIN
Attorney for Defendant

Date: 5/2/14

Date: 4/30/14

Date: 5/2/14

Date: _____